

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DECLARATION OF SARA B.
TOMEZSKO IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER
AND TO QUASH SUBPOENA**

I, SARA B. TOMEZSKO, subject to the penalties by law for perjury, do hereby declare the following to be true and correct on the basis of my personal knowledge. If called upon to do so, I would be competent to testify to the matters set forth in this declaration.

1. I am an associate at Paul Hastings LLP, a member in good standing of the Bar of the State of New York, and outside counsel for Defendant in this matter. My firm also represents Diane Greene for purposes of her deposition noticed in this matter.

2. Attached to my declaration as Exhibit 1 is a true and correct copy of the subpoena of Diane Greene dated October 7, 2020.

3. Attached to my declaration as Exhibit 2 is a true and correct copy of correspondence between my firm and counsel for Plaintiff on November 17, 2020, and November 19, 2020, regarding the deposition of Ms. Greene.

4. Attached to my declaration as Exhibit 3 are excerpts from the transcript of the deposition of Plaintiff Ulku Rowe, which took place on October 14, 2020.

5. Attached to my declaration as Exhibit 4 are excerpts from the transcript of the deposition of Tariq Shaukat, which took place on October 15, 2020.

6. Attached to my declaration as Exhibit 5 are excerpts from the rough transcript of the deposition Stuart Vardaman, which took place on November 17, 2020. A final transcript of Mr. Vardaman's deposition testimony is not yet available from the court reporter service.

7. Attached to my declaration as Exhibit 6 are excerpts from the transcript of the deposition of Brian Stevens, which took place on November 13, 2020.

8. Attached to my declaration as Exhibit 7 are excerpts from the transcript of the deposition of Will Grannis, which took place on October 29, 2020.

9. Plaintiff has noticed the deposition of Jennifer Burdis, the recruiter involved in hiring Plaintiff and other individuals into the Office of the CTO within Google Cloud during the 2016-2017 timeframe. Ms. Burdis' deposition was scheduled for November 10, 2020, but on November 9, 2020, Google agreed to postpone the deposition at Plaintiff's request. The parties are finalizing the date of Ms. Burdis' rescheduled deposition.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND CORRECT.

Signed on the 23rd day of November, 2020 in Jersey City, New Jersey.



Sara Tomezsko